



*Brockton, Massachusetts*  
*"City of Champions"*  
*Bill Carpenter – Mayor*

March 19, 2015

Ms. Susan Murphy  
U.S. Environmental Protection Agency – Region 1  
5 Post Office Square, Suite 100 (OEP06-1)  
Boston, MA 02109-3912

Subject: Brockton, Massachusetts - Permit Number MA 0101010 – Public Hearing 3/24/15  
Preliminary Comments on Draft NPDES Permit

Dear Ms. Murphy:

The City of Brockton is preparing detailed comments on the subject draft permit and will be submitting them separately in accordance with the requirements of the public notice. In conjunction with this public hearing, the City has developed these preliminary comments for the record.

In conjunction with the City's prior NPDES permit renewal, a consent agreement was negotiated with DEP and EPA, under which the City committed to extensive collection and treatment system upgrades. The City has committed over \$100 Million to the completion of this program, and the consent agreement was terminated in 2013. The City has gone above and beyond the requirements of this program in making continued improvements. The completed program has provided substantial I/I reduction, decreased flows, and significant improvements in operational efficiency, flexibility, capacity, and effluent quality at the City's advanced water reclamation facility (AWRF.)

In completing this work, the City worked closely with EPA and DEP, especially during the development of a regional wastewater needs study, performed in conjunction with the regional planning authority. In partnership with DEP, the regional wastewater study for the Upper Taunton River watershed identified needs for wastewater collection and treatment for neighboring communities. The Executive Office of Energy and Environmental Affairs documented that the acknowledged 20.5 MGD capacity of the plant would not increase potential pollutant loading to the Taunton River and "it would not increase environmental impacts."

The City has been proactive in demonstrating a commitment to compliance with the current permit, including ammonia limits, and significant improvements in nitrogen removal that meet the anticipated limits in the City of Taunton's permit. Brockton has been following the Taunton process closely, as its permit establishes the basis for purported impacts of Brockton's AWRF. The draft permit requires more extensive commitments from the City of Brockton to address further reduction in phosphorous and nitrogen, and the scientific basis for these requirements is concerning.

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The City also has concerns over onerous testing requirements that are included in the draft permit, included as a possible avenue for the City to pursue in conjunction with our standing request that the permitted flow reflect the design capacity of the AWRF. We are not aware of any other community that is faced with such extensive testing requirements.

The City appreciates the opportunity to provide these preliminary comments, and a more detailed submission with further questions will be forthcoming under the public comment period.

Thank you for your consideration.

Sincerely,



Mayor Bill Carpenter  
City of Brockton

cc: Lawrence Rowley, City of Brockton  
John Condon, City of Brockton  
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